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10 *Attorneys for Plaintiffs Shahriar Jabbari and Kaylee Heffelfinger*  
11 (*Additional Counsel on Signature Page*)

12  
13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION

16 SHAHRIAR JABBARI and KAYLEE  
17 HEFFELFINGER, on behalf of themselves and all  
18 others similarly situated,

19 Plaintiffs,

20 v.

21 WELL'S FARGO & COMPANY AND WELL'S  
22 FARGO BANK, N.A.,

23 Defendants.

24 No. 15-cv-02159-VC

25 **STIPULATION EXTENDING DEADLINE  
FOR FILING MOTION FOR  
PRELIMINARY APPROVAL AND CASE  
MANAGEMENT CONFERENCE;  
~~PROPOSED~~ ORDER**

26 Judge: Hon. Vince Chhabria  
Dept: Courtroom 4, 17<sup>th</sup> Floor  
Action Filed: May 13, 2015

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28 This Stipulation is made by and between Plaintiffs Shahriar Jabbari and Kaylee  
Heffelfinger (collectively, "Plaintiffs"), on the one hand, and Defendants Wells Fargo & Company  
and Wells Fargo Bank, N.A. (collectively, "Wells Fargo" and together with Plaintiffs, the  
"Parties"), on the other, as follows:

- (i) WHEREAS, on November 15, 2016, the Court set a further case management  
conference for December 13, 2016 at 1:30 p.m. (ECF 81);  
(ii) WHEREAS, on November 15, 2016, the Court set a deadline of December 9,  
2016 for Plaintiffs to file their Motion for Preliminary Approval (ECF 81);

- (iii) WHEREAS the Parties are continuing to negotiate the full terms of their settlement agreement with the assistance of a mediator;
  - (iv) WHEREAS, the Parties believe they will be in a better position to discuss the status of the matter if the case management conference is briefly delayed; and
  - (v) WHEREAS, Plaintiffs will file their Motion for Preliminary Approval by December 30, 2016.

NOW, THEREFORE, the Parties hereby stipulate that (a) the status conference currently scheduled for December 13, 2016 should be rescheduled to January 10, 2017 or the next available date after that on the Court's calendar, and (b) Plaintiffs shall file their Motion for Preliminary Approval by December 30, 2016.

1 DATED this 8th day of December, 2016.

2 KELLER ROHRBACK L.L.P.

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4 By /s/ Derek Loeser  
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18 By /s/ David H. Fry (w/verbal permission)  
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21 Attorneys for Defendants Wells Fargo & Co. and  
22 Wells Fargo Bank, N.A.

## **ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Date: December 9, 2016

Hon. Vince Chhabria  
United States District Court

No. 15-cv-02159-VC

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**STIPULATION EXTENDING  
DEADLINE FOR FILING MOTION  
FOR PRELIMINARY APPROVAL  
AND CASE MANAGEMENT  
CONFERENCE**